

Exhibit “A”

Stern&Stern^{LLP}

ATTORNEYS AT LAW

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April 3, 2017

CMRRR#7011 1570 0000 4410 3800**and Regular U.S. Mail**

Greyhound Lines, Inc.

538 Fellowship Rd

Mt Laurel, NJ 08054

Re: Maria Garcia v. Greyhound Lines, Inc., and Walter Lee Clay
Docket No.: ESX-L-1900-17
Our File No.: 1904.00

Dear Sir/Madam:

We enclose for service upon you a copy of the Summons and Complaint pursuant to Rule 4:4 4(a)(2) of the rules governing the Courts of New Jersey.

If you are insured, please forward the enclosed Summons and Complaint to your insurance carrier immediately.

If you are not insured, please advise us if you intend to defend this law suit. If so, please furnish us with the name of your attorney.

Very truly yours,


Dwight D. deStefan

DDS/cs
Encls.

STERN & STERN LLP
560 Sylvan Avenue – 2nd Floor
Englewood Cliffs, NJ 07632
(201) 569-2222
Attorneys for Plaintiff
Attorney I.D. #005691980

MARIA GARCIA,

Plaintiff,

vs.

GREYHOUND LINES, INC.,
AND WALTER LEE CLAY,
Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.: BER-L-1900-17

CIVIL ACTION
SUMMONS

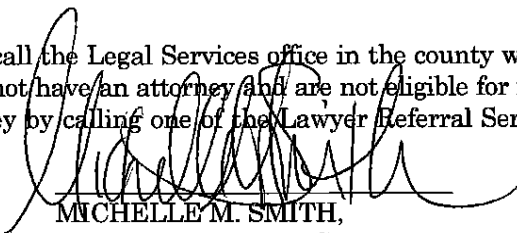
FROM STATE OF NEW JERSEY TO DEFENDANT: GREYHOUND LINES, INC.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The amended complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each Deputy Clerk of the Superior Court is provided). If the Complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00) for Law Division or for Chancery Division and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

DATED: April 3, 2017


MICHELLE M. SMITH,
Clerk of the Superior Court

Name of Defendant to Be Served:

Greyhound Lines, Inc.
350 St. Paul Street
Dallas, TX 75201

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN-PUBLIC-RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)




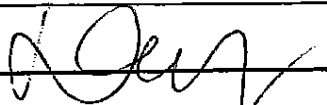
- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐ Putative Class Action☐ Title 59

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. _____ AMOUNT: _____ OVERPAYMENT: _____ BATCH NUMBER: _____	
	ATTORNEY / PRO SE NAME Dwight D. de Stefan, Esq.		TELEPHONE NUMBER (201) 569-2222	
	COUNTY OF VENUE Essex 		DOCKET NUMBER (when available) L-1900-17	
	FIRM NAME (if applicable) Stern & Stern, LLP		DOCUMENT TYPE Complaint	
OFFICE ADDRESS 560 Sylvan Ave, Suite 2170 Englewood Cliffs, NJ 07632		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
NAME OF PARTY (e.g., John Doe, Plaintiff) Maria Garcia		CAPTION Maria Garcia v. Greyhound Lines, Inc. and Walter Lee Clay		
CASE TYPE NUMBER (See reverse side for listing) 603Y	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input checked="" type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .				
ATTORNEY SIGNATURE: 				

STERN & STERN LLP
560 Sylvan Avenue – 2nd Floor
Englewood Cliffs, NJ 07632
(201) 569-2222
Attorneys for Plaintiff
Attorney I.D. #005691980

MARIA GARCIA,

Plaintiff,

vs.

GREYHOUND LINES, INC. AND
WALTER LEE CLAY

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO.: ESX-L- 1900-17

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Maria Garcia, residing at 60 North Arlington Avenue, Apt 403 East Orange, Essex County, New Jersey by way of Complaint against the defendants, states as follows:

1. At all times mentioned herein, defendant Greyhound Lines Inc. is a transportation company, providing bus services nationally including to and from the State of New Jersey, with its principal office located at 15110 Dallas Parkway, Dallas, Texas.
2. At all times mentioned herein, co-defendant Walter Lee Clay is an employee of defendant Greyhound Lines, Inc. and was engaged in the course of his employment with said defendant Greyhound Lines, Inc.
3. The defendant Greyhound Lines, Inc. at all times conducts its transportation business within or through the State of New Jersey and maintains offices and/or facilities at

a number of New Jersey locations including, but not limited to, 65 E. Main Street, Somerville, New Jersey and 538 Fellowship Blvd, Mount Laurel, New Jersey.

4. On or about August 19, 2015, plaintiff Maria Garcia was a passenger on defendant Greyhound Lines Inc. bus, travelling from Atlanta, Georgia back to her home in Essex County.

5. Upon reaching Richmond, Virginia, co-defendant Walter Lee Clay took over driving responsibilities of said bus in his capacity as an employee of defendant Greyhound Lines, Inc.

6 The co-defendant Walter Lee Clay drove the said bus, in which plaintiff was a passenger, in a negligent and careless manner causing the bus to crash into the rear of another vehicle on Interstate 95 in Greensville, Virginia.

7. As a result of the negligence aforesaid, the plaintiff Maria Garcia, was severely and permanently injured, and did thereby suffer a permanent loss of use of a body organ, function or system; permanent consequential limitation of use of a body organ; significant limitation of use of a body function or system; suffered a permanent injury that has had serious impact on her life, endured pain and suffering and loss of enjoyment of life, and will similarly endure in the future pain and suffering and loss of enjoyment of life, was forced to pay sums of money for medical and hospital expenses, and will do so in the future, and did further sustain losses and damages as a direct and proximate result of the conduct of the

defendant that were not otherwise reimbursed.

9. The defendant Greyhound Lines, Inc. is responsible for the injuries and damages sustained by plaintiff under the Doctrine of Respondeat Superior.

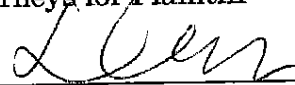
WHEREFORE, Plaintiff, Maria Garcia demands judgment against the defendants Greyhound Lines, Inc. and Walter Lee Clay, individually, jointly and severally for damages, interest and cost of suit.

PLEASE TAKE NOTICE: Plaintiffs demand trial by a jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Lawrence P. Stern, Esq. is hereby designated as trial counsel.


STERN & STERN, LLP
Attorneys for Plaintiff


DWIGHT D. de STEFAN

Dated: March 9, 2017

I certify that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding and no other action or arbitration proceeding is contemplated.

STERN & STERN, LLP
Attorneys for Plaintiff


DWIGHT D. de STEFAN

Dated: March 9, 2017

ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 776-9300
COURT HOURS 8:30 AM - 4:30 PM

DATE: MARCH 16, 2017
RE: GARCIA VS GREYHOUND LINES INC
DOCKET: ESX L -001900 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ANNETTE SCOCA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 776-9300 EXT 7183.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: LAWRENCE P. STERN
STERN & STERN LLP
560 SYLVAN AVE
SUITE 2170
ENGLEWOOD CLIFFS NJ 07632

JUGBONE

04/10/17 07:03 FAX 609 439 9078

GREYHOUND LINES

008/008